

1 ELIZABETH HAMRICK, ESQ.  
2 Nevada Bar No. 9414  
3 BRADLEY ARANT BOULT CUMMINGS LLP  
4 200 Clinton Avenue West, Suite 900  
5 Huntsville, AL 35801  
6 Telephone: (256) 517-5100  
7 Facsimile: (256) 517-5200  
8 Email: ehamrick@bradley.com

9 MICHAEL R. BROOKS, ESQ.  
10 Nevada Bar No. 7287  
11 GREGG A. HUBLEY, ESQ.  
12 Nevada Bar No. 7386  
13 BROOKS HUBLEY LLP  
14 1645 Village Center Circle, Suite 200  
15 Las Vegas, Nevada 89134  
16 Telephone: (702) 851-1191  
17 Facsimile: (702) 851-1198  
18 Email: mbrooks@brookshubley.com  
19 Email: ghubley@brookshubley.com

20 *Attorneys for Ditech Financial LLC fka Green Tree Servicing, LLC,  
21 and Walter Investment Management Corporation*

22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

29 SANFORD BUCKLES on behalf of himself and  
30 other similarly situated,

31 Case No.: 2:15-cv-01581-GMN-CWH

32 Plaintiff,  
33 v.

34  
35  
36  
37  
**MOTION AND PROPOSED ORDER TO  
WITHDRAW AS ATTORNEY OF  
RECORD  
[With Declaration of E.Hamrick in Support  
of Motion to Withdraw]**

38 GREEN TREE SERVICING, LLC, and  
39 WALTER INVESTMENT MANAGEMENT  
40 CORPORATION,

41 Defendants.

42  
43  
44  
45  
46  
47  
48  
49  
Elizabeth Hamrick, Esq. of the law firm of Bradley Arant Boult Cummings LLP respectfully  
50 moves this Court for an order permitting Elizabeth Hamrick to withdraw as attorney for defendants  
51 Ditech Financial LLC fka Green Tree Servicing, LLC and Walter Investment Management  
52 Corporation (previously dismissed from this case) (collectively Defendants). This motion is made  
53 pursuant to Local Rule IA 11-6 and Nevada Rule of Professional Conduct 1.16 and based upon the

1 Points and Authorities and the Declaration of Elizabeth Hamrick (Hamrick Declaration) incorporated  
2 herein, and such argument and evidence as may be presented at the hearing on this motion, should any  
3 occur, in the above-captioned case.

4 Dated August 28, 2017

5  
6 /s/ Elizabeth Hamrick  
7 ELIZABETH HAMRICK, ESQ.  
8 Nevada Bar No. 9414  
9 BRADLEY ARANT BOULT CUMMINGS LLP  
10 200 Clinton Avenue West, Suite 900  
11 Huntsville, AL 35801  
12 Telephone: (256) 517-5100  
13 Facsimile: (256) 517-5200

14  
15 **DECLARATION OF ELIZABETH HAMRICK, ESQ.**  
16 **IN SUPPORT OF MOTION TO WITHDRAW**

17 I, Elizabeth Hamrick, declare under penalty of perjury that the following is true and correct:

18 1. I am an attorney duly licensed to practice before all Courts in the State of Nevada, am  
19 an associate in the law firm of Bradley Arant Boult Cummings LLP since May 2011, and am one of  
20 the attorneys for Ditech Financial LLC fka Green Tree Servicing, LLC and Walter Investment  
21 Management Corporation (previously dismissed from this case) in the instant matter.

22 2. I have personal knowledge of the facts set forth below and believe them to be true. I  
23 am over eighteen years old, and I am competent to testify to the matters set forth herein.

24 2. My last day as an attorney at Bradley Arant Boult Cummings LLP will be August 31,  
25 2017, and on August 25, 2017, I informed our client Andrew Holm, Corporate Counsel for Ditech, of  
my departure from the firm and my intent to withdraw from this case as counsel for Defendants.

3. The client does not object to my withdrawal.

4. Michael R. Pennington, Esq. of Bradley Arant Boult Cummings LLP remains counsel  
for Ditech Financial LLC fka Green Tree Servicing, LLC and Walter Investment Management

1 Corporation (previously dismissed from this case).

2 Executed August 27, 2017.

3

4 /s/ Elizabeth Hamrick

5 ELIZABETH HAMRICK, ESQ

6

7

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9

10 As set forth in the Hamrick Declaration, Ms. Hamrick will cease to be an employee of Bradley

11 Arant Boult Cummings LLP, after August 31, 2017. Michael R. Pennington, Esq. of Bradley Arant

12 Boult Cummings LLP will remain as counsel for Ditech Financial LLC fka Green Tree Servicing,

13 LLC and Walter Investment Management Corporation (previously dismissed from this case). On

14 August 25, 2017, Ms. Hamrick informed Mr. Andrew Holm, Corporate Counsel for Ditech, of her

15 departure from the firm and her intent to withdraw from this case as counsel for Defendants.

16 Defendants do not object to her withdrawal from this case.

17 Local Rule IA 11-6(b) states that “[n]o attorney may withdraw after appearing in a case except

18 by leave of court after notice served on the affected client and opposing counsel.” The client has been

19 informed of Ms. Hamrick’s intent to withdraw, and opposing counsel in this case will receive notice

20 of this Motion to Withdraw via the CM/ECF system, pursuant to the certificate of service attached

21 here in. Additionally, Local Rule IA 11-6(e) provides that, except for good cause shown, “no

22 withdrawal … will be approved if it will result in delay of discovery, the trial, or any hearing in the

23 case.” Nevada Rules of Professional Conduct 1.16 provides that a lawyer may withdraw from

24 representation where the “[w]ithdrawal can be accomplished without material adverse effect on the

25 interests of the client.” Discovery in this case is currently stayed and there are no pending deadlines,

26 and no delay of any kind or prejudice to Defendants will result from Ms. Hamrick’s withdrawal at this

27 time, as Mr. Pennington will continue to defend this case.

1           **II. CONCLUSION**

2

3           Ms. Hamrick respectfully requests that this Court enter an order approving Elizabeth  
4           Hamrick's withdrawal as attorney for Ditech Financial LLC fka Green Tree Servicing, LLC and  
5           Walter Investment Management Corporation (previously dismissed from this case).

6

7           Dated August 28, 2017

8           /s/Elizabeth Hamrick

9           ELIZABETH HAMRICK, ESQ.

10           Nevada Bar No. 9414

11           BRADLEY ARANT BOULT CUMMINGS LLP

12           200 Clinton Avenue West, Suite 900

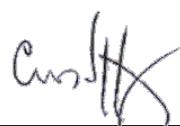
13           Huntsville, AL 35801

14           Telephone: (256) 517-5100

15           Facsimile: (256) 517-5200

16           **IT IS SO ORDERED.**

17           DATED August 29, 2017.

18             
19           \_\_\_\_\_  
20           UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedures 5(b), I hereby certify that on August 28, 2017, I caused the **MOTION AND PROPOSED ORDER TO WITHDRAW AS ATTORNEY OF RECORD [With Declaration of E.Hamrick in Support of Motion to Withdraw]** to be served by the Court's CM/ECF system.

An Employee of BROOKS HUBLEY LLP